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7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
10

11 JOSEPH HALBLEIB,

No. C 08-2657 CW

12 Plaintiff,

~~PROPOSED~~ ORDER AND
STIPULATION TO EXTEND DEADLINE
FOR COMPLETION OF FACT
DISCOVERY AND MEDIATION

13 v.
14

15 CHP OFFICER DALE COPPAGE; DOES
1-50, inclusive,

16 Defendants.
17 _____ /

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19 Plaintiff Joseph Halbleib and Defendant Dale Coppage, by and through their respective
20 counsel, hereby stipulate as follows:

- 21 1. The parties have been ordered to complete Fact Discovery by March 13, 2009.
22 2. Plaintiff has requested extensive discovery from Defendant by way of
23 interrogatories and requests for production of documents. Defendant originally made numerous
24 objections to Plaintiff's requests. After several conferences, Plaintiff and Defendant have
25

1 agreed that the majority of items requested by Plaintiff would be turned over pursuant to a
2 protective order. Defendant is in the process of compiling and producing these items.

3 3. Plaintiff can not take Defendant's deposition until after he has had the
4 opportunity to review the discovery which has yet to be produced by Defendant.
5

6 4. Counsel for Plaintiff will be on vacation and out of the country from February 26
7 through March 10, 2009.

8 5. In order to provide additional time to review forthcoming discovery, conduct
9 additional investigation as needed, and depose Defendant, the Plaintiff requests, and the parties
10 stipulate, that the deadline for completion of fact discovery be extended to April 15, 2009.
11

12 6. The parties agree that a mediation should not occur until after Plaintiff has had
13 the opportunity to depose Defendant. For this reason, the parties stipulate that the mediation
14 deadline be extended to April 30, 2009.

15 7. This is the first time the parties have requested an extension of deadline for
16 completion of fact discovery and the second time the parties have requested an extension of the
17 mediation deadline.
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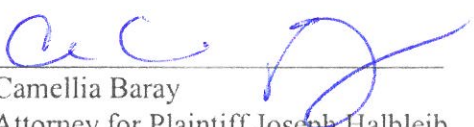
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1 8. The next case management conference in this matter is scheduled on May 28,
2 2009, and trial is scheduled to begin on September 14, 2009. An extension of time to complete
3 fact discovery and mediation will not interfere with the progression of this case as currently
4 scheduled.
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6 IT IS SO STIPULATED.
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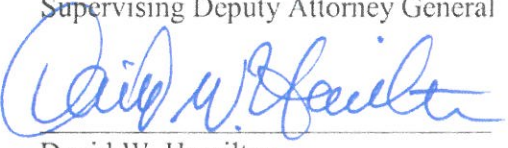
8 Dated: February 23, 2009
9

Bonjour, Thorman, Baray & Billingsley

10 
11 Camellia Baray
12 Attorney for Plaintiff Joseph Halbleib


13 Dated: February 20, 2009
14

Edmund G. Brown Jr.
Attorney General of the State of California
Tyler B. Pon
Supervising Deputy Attorney General

15 
16 David W. Hamilton
17 Deputy Attorney General
18 Attorneys for Defendant Dale Coppage
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20 PURSUANT TO STIPULATION, IT IS SO ORDERED.
21

22 2/25/09
23 DATED: _____
24

25 
26 THE HON. CLAUDIA WILKEN
27 UNITED STATES DISTRICT COURT
28 JUDGE